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12 Attorneys for Plaintiffs Kaiser Foundation
Health Plan, Inc.; Kaiser Foundation
13 Hospitals; The Permanente Medical Group,
Inc.; Southern California Permanente Medical
14 Group; Kaiser Foundation Health Plan of the
Mid-Atlantic States, Inc.; and Kaiser
15 Foundation Health Plan of Colorado

16 UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA

17 SAN FRANCISCO DIVISION

18 KAISER FOUNDATION HEALTH PLAN,
INC., KAISER FOUNDATION
19 HOSPITALS, THE PERMANENTE
MEDICAL GROUP, INC., SOUTHERN
20 CALIFORNIA PERMANENTE MEDICAL
GROUP, KAISER FOUNDATION
21 HEALTH PLAN OF THE MID-ATLANTIC
STATES, INC., and KAISER
22 FOUNDATION HEALTH PLAN OF
23 COLORADO

24 Plaintiffs,

25 v.

26 MEDQUIST, INC. AND MEDQUIST
27 TRANSCRIPTIONS, LTD.

28 Defendants.

Case No. C 08-03245 PJH

**STIPULATION TO CONTINUE DATES FOR
OPPOSITION, REPLY AND HEARING ON
DEFENDANTS' MOTION TO DISMISS
(DOCUMENT 16) AND MOTION TO
TRANSFER VENUE (DOCUMENT 18);
[PROPOSED] ORDER**

Date: August 27, 2008

Time: 9:00 a.m.

Location: Courtroom 3, 17th Floor

Judge: Hon. Phyllis J. Hamilton

1 TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Pursuant to Civil Local Rules 6-2 and 7-12, this Stipulation is entered into by and between
3 Plaintiffs Kaiser Foundation Health Plan, Inc., Kaiser Foundation Hospitals, The Permanente Medical
4 Group, Inc., Southern California Permanente Medical Group, Kaiser Foundation Health Plan of the
5 Mid-Atlantic States, Inc., and Kaiser Foundation Health Plan of Colorado (collectively, "Plaintiffs")
6 and Defendants MedQuist Inc. and MedQuist Transcriptions, Ltd. (collectively, "Defendants"), by
7 and through their counsel of record. Plaintiffs and Defendants are collectively referred to as the
8 "Parties."

9 WHEREAS, on July 21, 2008 and July 22, 2008, respectively, Defendants filed a Notice of
10 Motion and Motion to Dismiss, and a Notice of Motion and Motion to Transfer Venue to the District
11 of New Jersey; and

12 WHEREAS, Plaintiffs requested and Defendants agreed to stipulate to enlarge the time for
13 Plaintiffs to respond to these motions because Plaintiffs need additional time; and

14 WHEREAS, there have been no previous time modifications in this case, whether by
15 stipulation or Court order; and

16 WHEREAS, the requested time modification would have no impact on the overall schedule of
17 the case.

18 IT IS HEREBY STIPULATED by and between the Parties, by and through their respective
19 counsel, and subject to this Court's approval, that:

20 1. The hearing date for both motions, presently set for August 27, 2008, shall be
21 continued to September 24, 2008.

22 2. The date for Plaintiffs' oppositions to both motions, presently set for August 6, 2008,
23 shall be continued to August 27, 2008.

24 3. The date for Defendants' replies in support of both motions, presently set for August
25 13, 2008, shall be continued to September 10, 2008.

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1 Dated: July 29, 2008

GREENBERG TRAURIG, LLP

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3 By: /s/ Eve Triffo
EVE TRIFFO

4 Attorneys for Plaintiffs Kaiser Foundation Health
5 Plan, Inc.; Kaiser Foundation Hospitals; The
6 Permanente Medical Group, Inc.; Southern
7 California Permanente Medical Group; Kaiser
Foundation Health Plan of the Mid-Atlantic States,
Inc.; and Kaiser Foundation Health Plan of
Colorado

8 Dated: July 29, 2008

WINSTON & STRAWN LLP

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10 By: /s/ Kyle Gehrmann
KYLE GEHRMANN

11 Attorneys for Defendants MedQuist Inc. and
12 MedQuist Transcriptions, Ltd.

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14 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

15
16 Dated: 8/1/08

